

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ESTATE OF
ROGER D. OWENSBY JR., ET AL.,

Plaintiff,

V.

CITY OF CINCINNATI, ET AL.,

Defendants.

Case No. 01-CV-769

Senior Judge S. Arthur Spiegel

**PLAINTIFFS' NOTICE OF DEPOSITION
OF RULE 30(b)(6) REPRESENTATIVE(S) OF
DEFENDANT CITY OF CINCINNATI**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6), Fed. R. Civ. P.,
Plaintiffs will take the deposition of the most knowledgeable person or persons for
defendant City of Cincinnati concerning the following matter:

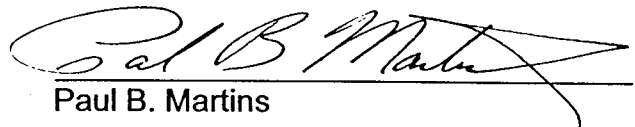
The person most knowledgeable concerning the documents produced by the City of Cincinnati, bearing the bates labels C000064-66, attached. Based upon the City of Cincinnati's correspondence of November 20, 2003, Plaintiff believes that this designated person will be Mr. Alan Goldschmidt of the Regional Crime Information Center.

In accordance with Fed. R. Civ. P. 30(b)(6), defendant City of Cincinnati is instructed to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf concerning the matters set forth above. The person or persons so designated shall testify as to matters known or reasonably available to the City of Cincinnati.

Exh. 109

The deposition(s) shall be held on December 19, 2003 at the law offices of Helmer, Martins & Morgan Co., L.P.A., Fourth & Walnut Centre, Suite 1900, 105 East Fourth Street, Cincinnati, Ohio, beginning at 10:00 a.m. The deposition(s) will be recorded stenographically. You are invited to attend.

Respectfully submitted,



Paul B. Martins

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served, this 24th day of November, 2003, via ordinary U.S. Mail upon the following:

Neil F. Freund
Vaseem S. Hadi
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City of Cincinnati and Thomas Streicher, Jr.*

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Cincinnati, Ohio 45202
*Trial Attorney for Defendants
City of Cincinnati and Thomas Streicher, Jr.,
David Hunter, Darren Sellers, Jason Hodge
and Cincinnati Police Officers John Does 1
through 6*

Mark T. Tillar
224 Clark Road
Cincinnati, Ohio 45215
Trial Attorney for Plaintiff

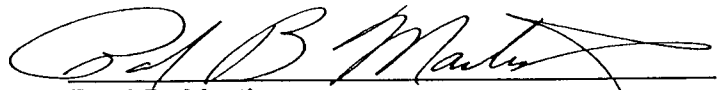
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and Bryan Menefee*

Ravert J. Clark
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Cincinnati, Ohio 45202
Trial Attorney for Defendant David Hunter


Paul B. Martins

Memo

Date: 11/13/2000

To: Darlene Lacke

Cc: Cincinnati Police

From: Mike Neumann, Regional Crime Information Center

RE: CTLNO 1743019

Tracking on Ctlno 1743019 for the last six months

MJN/mjn

C000064

11/13/00

Confidential

1

ERGO REPORT

FILTERING: LOCAL-CTLNO = 1743019

M D Y T FUNCTION TRANS ACTUAL RACS-ID

5	1	0	1220	QW	CRBD	CRBD	JMCKIERN
5	2	0	225	QHW	CH01	CH01	TPUSER
5	3	0	827	QW	CRBD	CRBD	RKISSING
5	4	0	1221	QW	CCBD	CCBD	RSTRATTO
5	6	0	2224	MDT	9R25		
5	6	0	2224	MDT	9R25		
5	6	0	2224	MDT	9R25		
5	6	0	2224	MDT	9R25		
6	6	0	730	QPS	PB29	PB29	LSCHNEID
6	6	0	1547	QHW	DPR3	DPR3	MCOMARAT
6	6	0	1548	QPS	DPR3	DPR3	MCOMARAT
6	8	0	716	QPS	PB29	PB29	LSCHNEID
6	21	0	1436	QHW	DPR3	DPR3	MCOMARAT
7	6	0	1413	QHW	DPR3	DPR3	MCOMARAT
7	21	0	1324	QHW	DPR3	DPR3	MCOMARAT
10	7	0	1743	MDT	3915		
10	7	0	1743	MDT	3915		
10	13	0	457	MDT	4351		
10	13	0	514	QPS	DST4	DST4	DJORDAN
10	13	0	618	QW	CWU4	CWU4	TAULL
10	13	0	826	QPS	CWU9	CWU9	SFERGUSO
10	13	0	835	QW	CWU4	CWU4	KFREYI
10	13	0	844	QHW	C348	C348	KTRUE
10	13	0	844	QPS	C348	C348	KTRUE
10	13	0	844	QJ06	C348	C348	KTRUE
10	13	0	950	QHW	C302	C302	KTRUE
10	13	0	951	QHW	C302	C302	KTRUE
10	13	0	1055	QPS	PT04	PT04	APOLI
10	13	0	2348	IQW	CT35	CT28	MROWEKAM
10	14	0	508	IQW	CWU6	CWU6	JPATTERS
10	14	0	621	QHW	CWU4	CWU4	JPATTERS
10	14	0	1130	QPS	C313	C313	EBLESKA
10	16	0	543	IQW	CWU4	CWU4	LWALTERS
10	17	0	704	QCH	CCID	CCID	HCHADWIC
10	17	0	1038	QRA	PRS6	PRS6	ASCHULZI
10	17	0	1357	QPS	CVCS	CVCS	DKELLY
10	23	0	1807	QPS	C310	C310	RRUZSA
10	23	0	1807	QHW	C310	C310	RRUZSA
10	25	0	1114	QPS	PRSC	PRSC	VBRYANT
10	25	0	2329	QHW	DST4	DST4	AHASSE
10	25	0	2330	QPS	DST4	DST4	AHASSE
10	25	0	2330	QPS	DST4	DST4	AHASSE
10	27	0	751	QRA	CRB3	CRB3	JBJERS
11	3	0	24	MDT	4351		
11	3	0	26	MDT	4351		
11	3	0	1047	QHW	PRSL	PRSL	MPRIESTL
11	3	0	1048	QPS	PRSL	PRSL	MPRIESTL
11	7	0	2010	MDT	4265		
11	7	0	2018	QHW	IDEN	IDEN	GVENTRE
11	7	0	2019	QPS	IDEN	IDEN	GVENTRE
11	7	0	2021	MDT	4252		
11	7	0	2131	MDT	4230		
11	7	0	2131	MDT	4230		
11	7	0	2133	MDT	4230		
11	7	0	2136	MDT	4240		
11	7	0	2138	MDT	4240		
11	7	0	2138	MDT	4240		
11	7	0	2138	MDT	4240		
11	7	0	2151	QHW	CRBU	CRBU	MGAYNOR
11	7	0	2208	QHW	CRBU	CRBU	MGAYNOR

C000065

11	7	0	2250 QPS	IDEN	IDEN	GVENTRE
11	7	0	2328 MDT	4255		
11	8	0	128 QPS	CRBU	CRBU	MGAYNOR
11	8	0	650 QPS	DST4	DST4	DMEECE
11	8	0	954 QPS	CT49	CT49	CMOCK1
11	8	0	956 QRA	CT49	CT49	CMOCK1
11	8	0	958 QPS	CT49	CT49	CMOCK1
11	8	0	1258 QHW	DPR4	DPR4	YFAIRBAN
11	8	0	1259 QPS	DPR4	DPR4	YFAIRBAN
11	8	0	1430 QHW	CRB2	CRB2	RUNGER
11	8	0	1431 QCH	CRB2	CRB2	RUNGER
11	8	0	1856 QHW	OPS2	OPS2	MHUDEPOH
11	9	0	34 MDT	5336		
11	9	0	35 MDT	5336		
11	9	0	35 MDT	5336		
11	9	0	735 MDT	7Y31		
11	9	0	738 MDT	7Y31		
11	9	0	738 MDT	7Y31		
11	9	0	738 MDT	7Y31		
11	9	0	738 MDT	7Y31		
11	9	0	738 MDT	8P13		
11	9	0	738 MDT	8P13		
11	9	0	830 QHW	NCH2	NCH2	JFULMER
11	9	0	831 QRSP	NCH2	NCH2	JFULMER
11	9	0	831 QD	NCH2	NCH2	JFULMER
11	9	0	1123 QHW	SLV2	SLV2	BPLUMMER
11	9	0	1123 QCH	SLV2	SLV2	BPLUMMER
11	9	0	2350 MDT	1331		
11	9	0	2350 MDT	1331		
11	9	0	2350 MDT	1331		
11	9	0	2350 MDT	1331		
11	9	0	2350 MDT	1331		
11	9	0	2350 MDT	1331		
11	11	0	729 MDT	5132		
11	11	0	730 MDT	5132		
11	11	0	730 MDT	5132		
11	11	0	730 MDT	5132		
11	11	0	730 MDT	5132		
11	11	0	730 MDT	5132		
11	11	0	1423 QCH	CT51	CT51	CMOCK1
11	11	0	1423 QPS	CT51	CT51	CMOCK1
11	12	0	158 MDT	3341		
11	12	0	158 MDT	3341		
11	12	0	158 MDT	3341		
11	12	0	158 MDT	3341		
11	12	0	158 MDT	3341		
11	12	0	158 MDT	3341		
11	12	0	200 MDT	3341		
11	12	0	401 QHW	DST1	DST1	JHENRY
11	12	0	403 QPS	DST1	DST1	JHENRY
11	12	0	408 QRA	DST1	DST1	JHENRY
11	12	0	409 QRA	DST1	DST1	JHENRY
11	12	0	409 QRA	DST1	DST1	JHENRY
11	10	0	9 MDT	4321		
11	10	0	1030 QPS	IDEN	IDEN	JZIEVERI
11	10	0	1030 QHW	IDEN	IDEN	JZIEVERI
11	10	0	1035 QD	IDEN	IDEN	JZIEVERI
11	10	0	1037 QRSP	IDEN	IDEN	JZIEVERI
11	10	0	1110 QCH	RENU	RENU	TGORMLY
11	10	0	1357 QPS	OPS2	OPS2	SMCMANIS
11	10	0	1358 QRA	OPS2	OPS2	SMCMANIS
11	10	0	1440 QPS	CIC1	CIC1	TLYONS
11	10	0	1441 QPS	OPS4	OPS4	JSTAGER
11	10	0	1442 QHW	OPS4	OPS4	JSTAGER
11	10	0	2038 MDT	1221		

C000066